



James B. Wright
Senior Attorney

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Carolina Telephone
Centel-North Carolina
Centel-Virginia
United Telephone-Southeast
SECRETARY

November 4, 1997

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

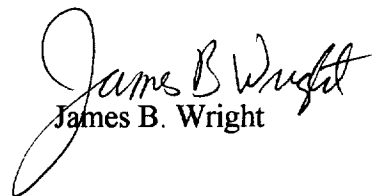
Re: Universal Service Generic Contested Case
Docket No. 97-00888

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of United Telephone-Southeast, Inc.'s Motion for Designation as an Eligible Telecommunications Carrier. We would appreciate your filing this Motion and calling it to the attention of the Directors for their action.

If you have questions, please call me or Laura Sykora at 919-554-7323.

Very truly yours,


James B. Wright

Enclosures

c: Bob Wallace
Steve Parrott
Austin Lyons

STATE OF TENNESSEE
TENNESSEE REGULATORY AUTHORITY

In Re:	}	
	}	
Application of United Telephone-	}	Docket No. 97-00888
Southeast, Inc. for Designation as	}	
an Eligible Telecommunications Carrier	}	

MOTION FOR DESIGNATION AS
AN ELIGIBLE TELECOMMUNICATIONS CARRIER

Pursuant to Section 214 of the Telecommunications Act of 1996 ("1996 Act") and as provided for at the October 2, 1997 Agenda Conference, United Telephone-Southeast, Inc. ("United") requests that the Tennessee Regulatory Authority ("TRA") designate and certify that United is an eligible telecommunications carrier in its designated service areas for federal universal service support purposes. In order to maintain uninterrupted federal universal service support, United requests that this designation be granted prior to January 1, 1998.

Under 47 U.S.C., Section 214(e)(2), the TRA "shall upon its own motion or upon request designate a common carrier that meets the requirements of Section 214(e)(1) as an eligible telecommunications carrier for a service area designated by the State Commission." Pursuant to Section 214(e)(1), a common carrier that has been designated an eligible telecommunications carrier "shall be eligible to receive universal support in accordance with Section 254."

United Telephone-Southeast, Inc. meets all the requirements of an eligible telecommunications carrier. In support of its request, United states as follows:

1. United offers the following services that are supported by federal universal support mechanisms under Section 254(c) using its own facilities:

- *Voice grade access to the public switched network
- *Local usage
- *Dual tone multi-frequency (TouchTone) or its functional equivalent
- *Single party service or its functional equivalent
- *Access to emergency services
- *Access to operator services
- *Access to interexchange services
- *Access to directory assistance, and
- *Toll limitation for qualifying low-income consumers

2. With regard to toll limitation, United does provide "toll blocking" as defined in 47 C.F.R. Section 54.500(b) of the FCC's rules, under which a customer may choose to have all toll-number calling blocked from the customer's telephone, including intraLATA toll calls, 1+ toll calls and 0+ toll calls. This service allows continued access to 1-800 numbers, 1-888 numbers and other toll-free area codes (even though calls to or through some of those numbers may allow customers to incur toll charges). This service allows continued access to 0-(local) operator services. It also allows continued access to 911 or E911 services available within United's serving area.
3. United does not presently provide "toll control" as that term is defined in 47 C.F.R. Section 54.400(c) of the FCC rules and hereby seeks a three-year waiver of the requirement that it provide toll control. In support of its waiver request, United states that, contrary to the FCC's finding at Paragraph 82 in its May 7, 1997 Report and Order on the Federal-State Joint Board on Universal Service (Common Carrier Docket 96-45), United is not aware that any "telecommunications carriers are deploying toll limitation [control] services in public telecommunications networks." United does not bill for all of the intraLATA or interLATA toll service

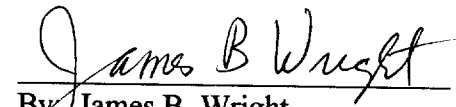
providers doing business in its serving area and has no method of limiting toll acquired from service providers for which it does not bill. United does not now collect toll usage information in "real time" and, moreover, since it cannot monitor the numerous different toll rates that could apply to various types of toll usage, it has no reliable way of correlating toll usage to a customer's requested toll limit. United will endeavor to make itself aware of any reliable method of toll control that becomes available within the telecommunications industry.

4. United advertises the availability of services designated for support and the charges therefor using media of general distribution and, as an incumbent LEC, utilizes standard customer notification and public notice procedures.
5. United commits, pursuant to FCC rule 54.401(b), that it will not disconnect Lifeline service for non-payment of toll charges and, pursuant to FCC rule 54.401(c) it will not require a service deposit in order to initiate Lifeline service if the low income consumer voluntarily elects toll blocking.

For the foregoing reasons, United Telephone-Southeast, Inc. respectfully requests that the TRA designate and certify United Telephone-Southeast, Inc. as an eligible telecommunications carrier in its designated service areas. United further requests that such designation be made by the TRA prior to January 1, 1998.

Respectfully submitted,

United Telephone-Southeast, Inc.


By: James B. Wright
Senior Attorney

14111 Capital Boulevard
Wake Forest, North Carolina 27587

Date: November 4, 1997